

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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AUG - 9 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Toll Free Access Codes) CC Docket No. 95-155
)
Database Services Management, Inc.) NSD File Nos. L-99-87
and Beehive Telephone Company, Inc.) and L-99-88
Petitions for Declaratory Rulings)

To: The Commission

APPLICATION FOR REVIEW

Beehive Telephone Company, Inc. ("Beehive"), by its attorney, and pursuant to § 1.115 of the Commission's Rules ("Rules"), hereby petitions the Commission to review the decision of the Common Carrier Bureau ("Bureau") not to publish in the Federal Register the document styled "Fifth Report and Order in CC Docket No. 95-155 Order in NSD File No. L-99-87 Order in NSD File No. L-99-88." *See Toll Free Serv. Access Codes*, FCC 00-237 (July 5, 2000) ("Order"). In support thereof, the following is submitted:

STANDING

Beehive filed comments in response to the summary recommendation of the North American Numbering Council that Database Service Management, Inc. ("DSMI") continue as the toll free number database administrator.^{1/} Beehive also initiated and participated in the Commission's declaratory ruling proceedings in NSD File Nos. L-99-87 and L-99-88.^{2/} By its *Order*, the Commission denied the relief Beehive sought in both Docket 95-155 and in the declaratory ruling

^{1/} See Reply Comments of Beehive Tel. Co., Inc., CC Docket No. 95-155 and NSD File No. L-98-85 (July 13, 1998).

^{2/} See, e.g., Petition for Declaratory Ruling, NSD File No. L-99-88 (Jan. 29, 1999).

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proceedings. Thus, Beehive had standing under § 405(a) of the Communications Act of 1934, as amended (“Act”), to seek reconsideration of the *Order*. See 47 U.S.C. § 405(a).

When the *Order* was released, Beehive had to consider several options. Obviously, it had the statutory right to seek reconsideration. See *id.* Beehive had the option of addressing the *Order* in support of its pending petition for rehearing of the D.C. Circuit Court of Appeals in *Beehive Tel. Co., Inc. v. FCC*, No. 99-1328 (D.C. Cir. May 18, 2000) (per curiam). It also had the statutory right to petition the Tenth Circuit Court of Appeals to review the *Order*. See 47 U.S.C. § 402(a); 28 U.S.C. §§ 2342(1), 2343. Finally, Beehive considered challenging the *Order* before the District Court in *Database Serv. Management, Inc. v. Beehive Tel. Co., Inc.*, C.D. Utah No. 2-96-CV-188-K.

Beehive initially decided to seek review in the Tenth Circuit, and a petition for review was prepared for filing by counsel in Utah. However, after reviewing evidence obtained from DSMI in the District Court action, and after additional research prompted by DSMI’s collateral estoppel arguments before that court, Beehive decided that it must exhaust its administrative remedies by presenting its new evidence to the Commission in a petition for reconsideration. See generally *Beehive Tel. Co., Inc. v. FCC*, 180 F.3d 314, 317-19 (D.C. Cir. 1999). That decision was made late on Friday afternoon, July 28, 2000.

Aware that the 30-day period for seeking reconsideration of final actions taken in rulemakings runs from the date of publication in the Federal Register, see 47 C.F.R. §§ 1.4(b)(1), 1.429(d), undersigned counsel was confident that he had sufficient time to prepare Beehive’s petition for reconsideration. However, on Thursday, August 3, 2000, counsel was advised by a paralegal that the *Order* had not been published in the Federal Register. That news prompted a call to another party to the rulemaking.

The undersigned was informed that the Bureau was not going to cause the *Order* to be published in the Federal Register, and therefore the Bureau would consider the deadline for seeking reconsideration to be the following day, Friday, August 5, 2000. Whereupon, counsel immediately sent the Bureau a letter by facsimile (at 12:30 p.m.) notifying it of the need for Federal Register publication and asking for relief and prompt guidance. *See infra* Attach. 1.^{3/} As a precautionary measure, a second letter was faxed (at 5:30 p.m.) to the Network Services Division (“NSD”) requesting a conditional one-week extension of the filing deadline so that Beehive could file its petition in the event we misread the Rules. *See infra* Attach. 2.

The undersigned attempted to prepare a petition for reconsideration for filing the next day. However, based on the rules and case law, he fully anticipated that the Bureau would either announce that the *Order* would be published in the Federal Register or set a new deadline in order to avoid prejudice. But, as another precautionary measure, counsel faxed a third letter to the NSD on August 4, 2000 (at 2:18 p.m.) asking the staff to treat Beehive’s letter request for an extension of time as a “timely-filed emergency motion for a brief extension of time” under § 1.46(b) of the Rules, which would have entitled Beehive to two business days after its extension request was denied to submit its petition. *See infra* Attach. 3.

The undersigned unsuccessfully attempted to contact the NSD to determine what actions would be taken with respect to Beehive’s various requests. While Beehive’s third letter was being transmitted to the NSD, we were advised by another party that the staff would not act on Beehive’s requests. This was confirmed subsequently by the NSD at 4:00 p.m., at which time the undersigned

^{3/} In his haste, counsel mistakenly addressed the letter to Mr. Strickling, rather than to Ms. Attwood. He apologizes for the error.

was informed that the *Order* would not be published in the Federal Register.

As a final precautionary measure, Beehive decided to file its incomplete petition for reconsideration on the Bureau's "deadline." Accordingly, the undersigned completed what he could in the little time that remained before the document had to be delivered to the Commission. Therefore, Beehive filed what amounted to an incomplete, unedited draft of a petition for reconsideration. A completed petition for reconsideration is being filed simultaneously herewith.

Beehive was clearly aggrieved by the Bureau's actions with regard to this matter. As we will discuss, Beehive had the right to expect the staff to obey the Rules and the dictates of procedural fairness. By failing to adhere to established procedures and to act to safeguard Beehive's right to be heard, the Bureau caused Beehive to expend its energies and resources protecting its right to due process, thereby incurring wholly unnecessary expenses. Thus, Beehive has standing to protect its procedural rights under the Act and the Rules. *See Lujan v. Defenders of Wildlife*, 504 U.S. 555, 572 n.7 (1992).

ARGUMENT

The applicable rules of procedure are straightforward. Section 405(a) of the Act requires a petition for reconsideration to be filed within 30 days from the date upon which public notice is given of the action complained of by the petitioner. *See* 47 U.S.C. § 405(a). Likewise, § 1.429 of the Rules provides that a petition for reconsideration of a final action in a rulemaking proceeding must be filed "within 30 days from the date of public notice of such action, as that date is defined in § 1.4(b)." 47 C.F.R. § 1.429(d); *Amendment of Procedures for Reconsideration of Actions in Notice and Comment Rulemaking Proceedings*, 57 FCC 2d 699, 699 (1975). Section 1.4(b) in turn states in relevant part that for "documents in notice and comment rulemaking proceedings," the term

“public notice” means “the date of publication in the Federal Register.” 47 C.F.R. § 1.4(b)(1).

The Rules are also clear as to publication in the Federal Register. Section 0.445 of the Rules states unequivocally, “All rulemaking documents are published in the Federal Register.” 47 C.F.R. § 0.445(c). And § 0.411 makes it explicit that rulemaking decisions adopted by the Commission are “rulemaking documents for the purposes of Federal Register publication.” *Id.* § 0.441(b)(2). *See Publication of Commission Documents*, 59 Rad. Reg. 2d (P&F) 1214, 1215 (1986).

The Commission construes §§ 1.4(b)(1) and 1.429(d) to mean what they clearly say. *See, e.g., Implementation of Section 207 of the Telecommunications Act of 1996*, 14 FCC Rcd 19924, 19925 & n.9 (1999). If there is uncertainty as to the deadline for filing petitions for reconsideration of orders in rulemaking proceedings, public notices clarifying the filing deadlines are routinely issued. *See, e.g., Clarification of Filing Deadline for Petitions for Reconsideration of the CMRS Local Number Portability Forbearance Order*, 14 FCC Rcd 3908 (WTB 1999). Such was the case when the Commission granted a petition for declaratory ruling challenging an order of the Pennsylvania PUC concerning area code relief. *See Petition for Declaratory Ruling and Request for Expedited Action on the Order of the Pennsylvania PUC Regarding Area Codes 412, 610, 215, and 717*, 13 FCC Rcd 19009 (1998) (“*Declaratory Ruling*”).

Thirty days after the *Declaratory Ruling* was released, the NSD issued a public notice in response to requests for clarification of the deadline for filing petitions for reconsideration. *See Clarification of Filing Deadline for Petitions for Reconsideration of the Commission Order Addressing the July 15, 1997 Order of the Pa. PUC*, 13 FCC Rcd 21821 (NSD 1998) (“*NSD Deadline Clarification*”). The NSD issued the following clarification:

Because the [*Declaratory Ruling*] was, in part, a reconsideration of

an order in the Commission's *Local Competition* rulemaking proceeding, pursuant to 47 C.F.R. §§ 1.4(b) and 1.429, petitions for reconsideration of the [*Declaratory Ruling*] shall be filed within thirty days of publication of a summary of the [*Declaratory Ruling*] in the *Federal Register*.⁴

Here, the *Order* was primarily the "Fifth Report and Order" in this so-called "toll free rulemaking" in Docket 95-155.⁵ Since the proceeding in Docket 95-155 is conducted as a notice and comment rulemaking, *see Toll Free Serv. Access Codes*, 10 FCC Rcd 13692, 13707 (1995), the *Order* is a "final action" in a rulemaking proceeding under § 1.429(a) of the Rules. For the same reason, the *Order* is both: (1) a "rulemaking document" under § 0.411(b)(2), which must be published in the Federal Register pursuant to § 0.445(c); and (2) a document in a "notice and comment rulemaking" proceeding for the purpose of determining the public notice date under § 1.4(b)(1). Thus, the filing deadline for a petition for reconsideration of the *Order* is 30 days after the date of its publication in the Federal Register, irrespective of the fact that the Order also included declaratory rulings. *See NSD Deadline Clarification*, 13 FCC Rcd at 21821.

The Bureau erred in not providing notice in the Federal Register under the principle that an "agency is bound to obey its own rules," *Gardner v. FCC*, 530 F.2d 1086, 1089 (D.C. Cir. 1976), or as Judge Starr put it, "rules are rules." *Reuters, Ltd. v. FCC*, 781 F.2d 946, 951 (D.C. Cir. 1986). The *Order* is a rulemaking document, and by rule all such documents are published in the Federal Register. For the fundamental reason that the agency "must adhere to its own rules," *id.* at 950, the Commission must publish the *Order* in the Federal Register, as the Bureau should have done shortly

⁴ *NSD Deadline Clarification*, 13 FCC Rcd at 21821.

⁵ *See* Brief for Respondents at 21, *Beehive Tel. Co., Inc. v. FCC*, No. 99-1328 (D.C. Cir. decided May 15, 2000).

after the document was released. *See Federal Register Publication of the Second Further Notice of Proposed Rulemaking Regarding the Licensing of Cellular Service and Other Commercial Mobile Radio Services in the Gulf of Mexico*, 15 FCC Rcd 5697 (WTB 2000).

Once having promulgated rules stating that all rulemaking documents are published in the Federal Register, and that the date of their publication is the date of public notice for calculating statutory filing deadlines for seeking reconsideration, the Commission has created a “reasonable expectation” in the parties to rulemaking proceedings that such notice will be provided. *Gardner*, 530 F.2d at 1090.^{6/} This is particularly true in the case of Beehive.

Beehive challenged the structure of toll free numbering administration under § 251(e)(1) in comments filed in May 1996 in the *Local Competition* rulemaking in CC Docket No. 96-98,^{7/} and again in a September 1996 petition for reconsideration of the Second Report and Order in that proceeding.^{8/} The Commission denied Beehive’s petition for reconsideration in July 1999, but stated that the issues Beehive raised would be addressed in this docket. *See Implementation of the Local Competition Provisions of the Telecomms. Act of 1996*, 14 FCC Rcd 16559, 16565 (1999).

When Beehive sought review of the Commission’s failure to adopt rules to implement § 251(e) of the Act with respect to toll free numbers, the Commission advised the D.C. Circuit in May

^{6/} Publishing the *Order* in the Federal Register is no small matter legally. When a form of notice is mandated by an agency’s rules, and that notice triggers a statutory right to be heard, then the agency must provide the requisite notice as a component of due process. As in this case, the failure to provide notice in the Federal Register jeopardizes a statutory right of access to the Commission by those relying on such notice. That implicates the First and Fifth Amendments.

^{7/} *See* Comments of Beehive Tel. Co., Inc., CC Docket No. 96-98 (May 20, 1996).

^{8/} *See* Petition for Reconsideration, CC Docket No. 96-98 (Sept. 30, 1996).

of this year that: (1) the issues Beehive raised were pending in the “toll free rulemaking” in this docket; (2) the staff was preparing an order on the issues for Commission consideration in the toll free rulemaking; and (3) the order disposing of the issues would be issued during the spring of 2000.⁹ While it denied Beehive’s petition for review, the D.C. Circuit clearly expressed its agreement with Beehive’s argument that the Commission had not adopted rules to implement § 251(e) with respect to toll free numbers:

We sympathize with Beehive’s frustration at the FCC’s slow pace in promulgating regulations relating to toll-free numbering administration. * * * Although we have agreed with the FCC that the 1996 Act did not require the agency to implement regulations by August 8, 1996, that deadline and others in the 1996 Act reflected Congress’s sense of urgency when it ordered the implementation of neutral and competitive numbering administration of all types. The FCC has assured the court that it will issue an order disposing of the matters raised by Beehive during the spring of 2000. We trust it will “adhere substantially to the schedule it set for itself”¹⁰

The D.C. Circuit clearly expected the Commission to promulgate rules in this proceeding. In light of the assurances given the Court, Beehive had good cause to expect that the issues it first presented in the *Local Competition* rulemaking, and that were referred for consideration in this rulemaking,¹¹ would be decided by the Commission in the context of this rulemaking. Thus, when the Commission issued its decision, it never occurred to Beehive that the *Order* was not a document in a “notice and comment rulemaking” proceeding under § 1.4(b)(1) of the Rules.

⁹ See Brief for Respondents at 21, 23, *Beehive* (D.C. Cir. No. 99-1328).

¹⁰ *Beehive*, D.C. Cir. No. 99-1328, at 2.

¹¹ See *Implementation of the Local Competition Provisions of the Telecomms. Act of 1996*, 11 FCC Rcd 19392, 19510-11 (1996) (Commission states that the “specific details” of implementation for toll free services were being addressed in the “toll free proceeding” in CC Docket No. 95-155).

Beehive also had no doubt that the *Order* was a final action in a rulemaking proceeding for the purposes of § 1.429(a). The Commission effectively denied Beehive's request to adopt rules to implement § 251(e)(1) of the Act. That constitutes a final action. *See Her Majesty the Queen in Right of Ontario v. EPA*, 912 F.2d 1525, 1531-32 (D.C. Cir. 1990) (EPA denial of request to promulgate findings was a final action); *Natural Resources Defense Council, Inc. v. EPA*, 902 F.2d 962, 980 (D.C. Cir. 1990) (EPA decision not to issue standard was final action). Regardless, the *Order* authorized DSMI to continue administering toll free numbers (under the dominance of the Bell Operating Companies). Therefore, the *Order* had to be published in the Federal Register, because it was a rulemaking document "having general applicability and legal effect." 47 C.F.R. § 0.411(b)(2). If the Bureau defines a "rulemaking document" differently than does the Rules, the staff's definition amounts to a "file cabinet rule" unknown to, and unenforceable against, Beehive. *Advanced Electronics*, 18 Rad. Reg. 2d (P&F) 216, 221 (Rev. Bd. 1970).

The Commission has long recognized that it would be inconsistent with administrative fairness and the public interest to allow a lack of notice attributable to a procedural omission by the Bureau to cause a deprivation of a statutory right. *See Central Mobile Radio Phone Serv.*, 65 FCC 2d 648, 651 (1977). In this case, Beehive was clearly prejudiced by the "severe time pressure" that the lack of notice placed on its counsel. *Gardner*, 530 F.2d at 1092. The less than two days that counsel was given to file Beehive's petition for reconsideration was inadequate to allow him to address all the significant issues presented by the *Order*. *See id.* at 1091 n.24. Therefore, the Commission should remedy the Bureau's failure to afford the requisite notice in this case by accepting Beehive's completed Petition for Reconsideration as timely-filed.

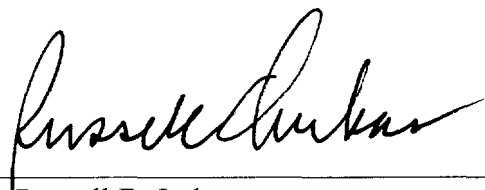
In the event that it determines that the Bureau had grounds to withhold Federal Register

publication, the Commission must assess whether Beehive nonetheless “justifiably understood” that its petition for reconsideration would not be due until 30 days after the *Order* appeared in the Federal Register. *See McElroy Electronics Corp. v. FCC*, 990 F.2d 1351, 1358 (D.C. Cir. 1993). In light of the explicit language of the applicable Rules, the Commission should find that Beehive’s expectation that the *Order* would be published in the Federal Register was entirely reasonable. *See Gardner*, 530 F.2d at 1090. If so, the Commission should find that there is good cause to accept Beehive’s completed Petition for Reconsideration as a supplement to the petition it was forced to file on August 4, 2000. *See* 47 C.F.R. § 1.429(d). *See also Meredith Corp. v. FCC*, 809 F.2d 863, 869 (D.C. Cir. 1987).

For all the foregoing reasons, Beehive respectfully requests that the Commission cause the *Order* to be published in the Federal Register and that it accept and consider Beehive’s Petition for Reconsideration, filed simultaneously herewith, either as a substitute for, or as a supplement to, the Petition for Reconsideration filed on August 4, 2000.

Respectfully submitted,

BEEHIVE TELEPHONE COMPANY, INC.

By: 

Russell D. Lukas
Its Attorney

Lukas, Nace, Gutierrez & Sachs, Chartered
1111 Nineteenth Street, N.W., Suite 1200
Washington, D.C. 20036
(202) 828-9467

August 9, 2000

LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1111 NINETEENTH STREET, N.W.

SUITE 1200

WASHINGTON, D.C. 20036

(202) 857-3500

RUSSELL D. LUKAS
DAVID L. NACE
THOMAS GUTIERREZ
ELIZABETH R. SACHS
GEORGE L. LYON, JR.
JOEL R. KASWELL
PAMELA L. GIST
DAVID A. LAFURIA
MARILYN SUCHECKI MENSE
PAMELA GAARY HOLRAN
B. LYNN F. RATNAVALE
TODD SLAMOWITZ
DAVID M. BRIGLIA+
ALLISON M. JONES+

+ NOT ADMITTED IN D.C.

CONSULTING ENGINEERS
ALI KUZEHKANANI
LEROY A. ADAM
LEILA REZANAVAZ
AHMAD EL-OMAR

OF COUNSEL
JOHN J. MCAVOY
J.K. HAGE III+

TELECOPIER
(202) 842-4485

Email: lngs@fcclaw.com
http://www.fcclaw.com

WRITER'S DIRECT DIAL

August 3, 2000

(202) 828-9467

Via Facsimile

Lawrence Strickling, Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Room 5-C450
Washington, DC 20036

RECEIVED

AUG 3 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Fifth Report and Order in CC Docket No. 95-155,
FCC 00-237 (released July 5, 2000)

Dear Mr. Strickling:

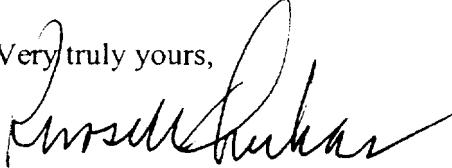
After determining that the Fifth Report and Order in CC Docket No. 99-155 had not been published in the Federal Register, I contacted another party to the toll free rulemaking proceeding and was informed that the Commission does not intend to publish the document in the Federal Register. However, because the Fifth Report and Order is clearly a rulemaking document, its publication in the Federal Register is required by the Commission's Rules. *See* 47 C.F.R. § 0.445(c) ("All rulemaking documents are published in the Federal Register"). The matter is of some significance, because the 30-day period to file a petition for reconsideration of an action in a rulemaking proceeding runs from the date of public notice of the action, *see id.* § 1.429(d), which is the date of publication in the Federal Register. *See id.* § 1.4(b)(1).

I represent a party to the toll free rulemaking that plans to seek reconsideration of the Fifth Report and Order, and I reasonably relied on §§ 0.445(c) and 1.4(b)(1) of the Rules to establish the deadline for filing my client's petition for reconsideration. *Cf. Adams Telecom, Inc. v. FCC*, 997 F.2d 955, 957 (D.C. Cir. 1993). If the Commission considers its Fifth Report and Order to be a non-rulemaking document, and takes the position that the 30-day period for seeking reconsideration expires tomorrow, my client is going to be severely prejudiced.

It seems to me that the Commission is bound by its own rules to publish the Fifth Report and Order in the Federal Register. The fact that a portion of the order disposes of the petitions for declaratory rulings in NSD File Nos. 99-87 and 99-88 does not exempt the order from Federal Register publication. The declaratory ruling proceeding was consolidated with Docket 99-155 at the direction of the Bureau, conducted as a notice and comment proceeding, and decided in conjunction with the Fifth Report and Order on the basis of the same record. Moreover, because the Commission's declaratory rulings were based in part on findings it made in the rulemaking, a party could not seek reconsideration of the declaratory rulings without seeking reconsideration of the rulemaking findings.

I respectfully request that the Bureau issue a public notice today stating that the Fifth Report and Order will be published in the Federal Register and that petitions for reconsideration of the actions taken by the Commission will be due within 30 days of such publication. If the order is not to be published, a public notice should still be issued today to explain why Federal Register publication is not required and to establish a new filing deadline to avoid prejudice to those who relied on the letter of the Commission's Rules.

Considering the urgency of this matter, I respectfully request to be advised as soon as possible today as to how the Commission is going to proceed.

Very truly yours,


Russell D. Lukas

cc: Mr. Charles Keller (via facsimile)
Mr. Marty Schwimmer (via facsimile)
John M. Goodman, Esq. (via facsimile)
Leon M. Kestenbaum, Esq. (via facsimile)
Henry G. Hultquist, Esq. (via facsimile)
Louise L.M. Tucker, Esq. (via facsimile)

LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1111 NINETEENTH STREET, N.W.

SUITE 1200

WASHINGTON, D.C. 20036

(202) 857-3500

RUSSELL D. LUKAS
DAVID L. NACE
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GEORGE L. LYON, JR.
JOEL R. KASWELL
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B. LYNN F. RATNAVALE
TODD SLAMOWITZ
DAVID M. BRIGLIA+
ALLISON M. JONES+

+ NOT ADMITTED IN D.C.

August 3, 2000

CONSULTING ENGINEERS
ALI KUZEHKANANI
LEROY A. ADAM
LEILA REZANAVAZ
AHMAD EL-OMAR

—
OF COUNSEL

JOHN J. MCAVOY
J.K. HAGE III+

—
TELECOPIER
(202) 842-4485

—
Email: lngs@fcclaw.com
<http://www.fcclaw.com>

—
WRITER'S DIRECT DIAL

(202) 828-9467

Via Facsimile

Charles Keller, Chief
Network Services Division
Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, N.W., Room 6-A324
Washington, D.C. 20554

Re: Fifth Report and Order in CC Docket No. 95-155,
FCC 00-237 (released July 5, 2000)

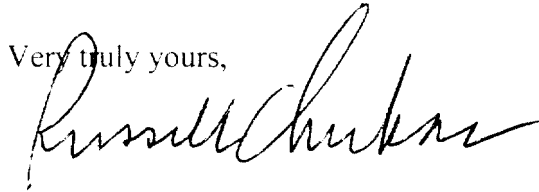
Dear Mr. Keller:

In light of the matters addressed in the letter I submitted to Mr. Strickling earlier today, I respectfully request that the Commission grant Beehive Telephone Company, Inc. a one-week extension of time to submit a petition for reconsideration of the above-referenced order. My good faith reliance on §§ 0.445(c) and 1.4(b)(1) of the Commission's Rules constitute good cause to grant the requested extension of the filing deadline. Although the 30-day deadline for filing a petition for reconsideration is statutory, the Commission has the discretion to grant Beehive relief under these circumstances in the interests of procedural fairness. *See Gardner v. FCC*, 530 F.2d 1086, 1091 (D.C. Cir. 1976). *See also Meredith Corp. v. FCC*, 809 F.2d 863, 869 (D.C. Cir. 1987).

I am making this request to preserve my client's rights in the event the Commission determines that publication of the Fifth Report and Order in the Federal Register was not required under the Rules. Consequently, this request should not be construed as a concession either that Federal Register publication is not required or that a petition for reconsideration of the Fifth Report and Order is due tomorrow under § 1.429(d) of the Rules or § 405(a) of the Communications Act.

For the reasons set forth herein and in my previous letter on this matter, I respectfully request that the time within which Beehive must submit its petition for reconsideration be extended to August 11, 2000.

Very truly yours,

A handwritten signature in black ink, appearing to read "Russell D. Lukas". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

Russell D. Lukas

cc: Mr. Marty Schwimmer (via facsimile)
John M. Goodman, Esq. (via facsimile)
Leon M. Kestenbaum, Esq. (via facsimile)
Henry G. Hultquist, Esq. (via facsimile)
Louise L.M. Tucker, Esq. (via facsimile)

LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1111 NINETEENTH STREET, N.W.

SUITE 1200

WASHINGTON, D.C. 20036

(202) 857-3500

CONSULTING ENGINEERS

ALI KUZEHKANANI

LEROY A. ADAM

LEILA REZANAVAZ

AHMAD EL-OMAR

—

OF COUNSEL

JOHN J. MCAVOY

J.K. HAGE III⁺

TELECOPIER

(202) 842-4485

Email: lngs@fcclaw.com

<http://www.fcclaw.com>

WRITER'S DIRECT DIAL

(202) 828-9467

rlukas@fcclaw.com

RUSSELL D. LUKAS
DAVID L. NACE
THOMAS GUTIERREZ
ELIZABETH R. SACHS
GEORGE L. LYON, JR.
JOEL R. KASWELL
PAMELA L. GIST
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MARILYN SUCHECKI MENSE
PAMELA GAARY HOLRAN
B. LYNN F. RATNAVALE
TODD SLAMOWITZ
DAVID M. BRIGLIA⁺
ALLISON M. JONES⁺

⁺ NOT ADMITTED IN D.C.

August 4, 2000

VIA FACSIMILE

Charles Keller, Chief
Network Services Division
Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, N.W., Room 6-A324
Washington, D.C. 20554

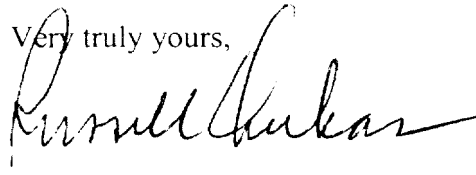
Re: Beehive Telephone Company, Inc.
Request for Extension of Time

Dear Mr. Keller:

Reference is made to the letter request I filed yesterday on behalf of Beehive Telephone Company, Inc. for an extension of time to file a petition for reconsideration of the Commission's Fifth Report and Order in CC Docket No. 95-155. Because I only learned yesterday that the Commission did not intend to publish the order in the Federal Register, it would be appropriate for the Bureau to treat the extension request as a timely-filed emergency motion for a brief extension of time under § 1.46(b) of the Commission's Rules. Therefore, if the request is denied, Beehive would be entitled to file its petition two business days after its request was denied. *See* 47 C.F.R. § 1.46(b).

In order to avoid prejudice to Beehive, I respectfully ask the Bureau to waive § 1.46(b) of the Rules to the extent necessary to allow Beehive's request to be considered a timely-filed motion for a brief extension of time to make a filing in a rulemaking proceeding. *Grant of such limited relief under the circumstances would serve the public interest and the interests of procedural fairness.* Beehive should not be deprived of a reasonable opportunity to exercise its statutory right to seek reconsideration because of my reliance on the explicit terms of §§ 0.445(c), 1.4(b)(1) and 1.429(d) of the Rules.

Should any questions arise with respect to this matter, please give me a call.

Very truly yours,

Russell D. Lukas

cc: Mr. Marty Schwimmer (via facsimile)
John M. Goodman, Esq. (via facsimile)
Leon M. Kestenbaum, Esq. (via facsimile)
Henry G. Hultquist, Esq. (via facsimile)
Louise L.M. Tucker, Esq. (via facsimile)

CERTIFICATE OF SERVICE

I, Catherine M. Seymour, a secretary in the law firm of Lukas, Nace, Gutierrez & Sachs, Chartered, do hereby certify that I have caused to be hand delivered on this 9th day of August, 2000, copies of the foregoing "Application for Review" to the following:

Dorothy Atwood, Chief
Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, S.W., Room 5-A848
Washington, D.C. 20554

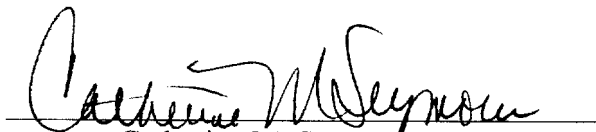
Susan H. Steiman, Esquire
Associate General Counsel-Administrative Law
Federal Communications Commission
445 Twelfth Street, S.W., Room 8-B616
Washington, D.C. 20554

John M. Goodman, Esquire
Bell Atlantic
1300 Eye Street, N.W., Suite 400 West
Washington, D.C. 20005-3314

Leon M. Kestenbaum, Esquire
Sprint Communications
401 9th Street, N.W., 4th Floor
Washington, D.C. 20004

Henry G. Hultquist, Esquire
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Louise L. M. Tucker, Esquire
Bell Communications Research, Inc.
2101 L Street, N.W., Suite 600
Washington, D.C. 20036


Catherine M. Seymour